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FEB 15 2000

**State of New Jersey**

Department of Environmental Protection

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February 3, 2000

Ms. Wendy R. Dixon, EIS Project Manager
U.S. Department of Energy
Office of Civilian Radioactive Waste Management
Yucca Mountain Site Characterization Office
P.O. Box 30307, M/S 010
North Las Vegas, NV 89036-0307

RE: COMMENTS
YUCCA MOUNTAIN DRAFT EIS

Dear Ms. Dixon:

The Office of Program Coordination of the New Jersey Department of Environmental Protection has completed its review of the Draft Environmental Impact Statement (EIS) for the Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada. We offer the following comments regarding potential adverse impacts associated with possible transportation modes.

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The proposed repository impacts New Jersey in several ways. Transportation of spent fuel from the four nuclear power plants of New Jersey must consider possible transportation modes and routes to select the one most appropriate. The Draft EIS also considers a no action alternative that would result in contained on-site storage of spent fuel at the four New Jersey plants. This storage is analyzed for up to 1000 years. The review of the Draft EIS by our Radiation Protection Programs indicates that the document does not fully address the impacts of using barges to transport the spent fuel.

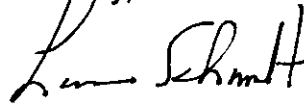
Two proposed modes of transportation are analyzed in the Draft EIS. These are for use of mostly rail and use of mostly highway for the shipments. The Artificial Island and Oyster Creek sites are appropriately categorized as sites with indirect rail access. Therefore, the Draft EIS considers heavy hauling of

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spent fuel cakes to the nearest railhead accessible by water. The Draft EIS addresses the barging option in only a cursory manner in Appendix J, Transportation. For example, the proposed barge route for Oyster Creek shows the route to be north from the site to Port Newark in New Jersey. The impacts of this mode and route are not fully addressed. The likelihood of construction work on the barge slip and dredging in order to use the barge slip and waterway are examples of impacts that are not mentioned or addressed. In order to utilize a barge, the spent fuel would have to exit the Oyster Creek plant site, traverse a heavily-traveled state highway by heavy haul, and then be transferred to a barge in close proximity to the same state highway. We do not believe that the Draft EIS adequately addresses the impacts of this option.

Thank you for the opportunity to comment on the Draft EIS.

Sincerely,



Lawrence Schmidt
Director
Office of Program Coordination

C: Jill Lipoti, NJDEP